

**MILMAN LABUDA LAW GROUP PLLC**

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July 1, 2025

**VIA ECF**

United States District Court  
Eastern District of New York  
Attn: Hon. Pamela K. Chen, U.S.D.J.  
225 Cadman Plaza East, Courtroom 11D South  
Brooklyn, NY 11201-1804

**Re: IME WatchDog, Inc. v. Gelardi, et al.**  
**Case No.: 1:22-cv-1032 (PKC) (JRC)**

Dear Judge Chen:

This office, along with Sage Legal LLC, represents the Plaintiff IME WatchDog, Inc. (“Plaintiff”), in the above-referenced case.

Plaintiff submits this letter, pursuant to this Court’s individual rules, to request a pre-motion conference concerning its anticipated motion to amend the complaint to add the following IME observers as defendants: Jeffrey Beiben, Christian Hogarth, Fari Gutierrez, Lizbeth Medina, Mark Purficati, Sara Gonzalez, Tiffany Uribe, and David Segovia. Upon information and belief, these IME observers assisted Defendants in misappropriating Plaintiff’s trade secrets and several of them continue to do so. See ECF Docket Entry [516](#), at 26-29 (establishing Zelle payments made by Safa to observers, Jeffrey Beiben, Christian Hogarth, and Dave Sagovia). In addition, Plaintiff seeks leave to amend the complaint to assert additional causes of action against Defendants Safa Gelardi and Vito Gelardi arising out of conduct previously complained of in letter motion practice. See, e.g., ECF Docket Entry [315](#).

Plaintiff respectfully notes that its earlier letter motion for a pre-motion conference<sup>1</sup> remains *sub judice*, but has been rendered moot by virtue of Plaintiff’s settlement with putative Defendants Eugene Liddie and IME Legal Reps LLC.

Dated: Lake Success, New York  
July 1, 2025

Respectfully submitted,

**MILMAN LABUDA LAW GROUP PLLC**

/s/ Jamie S. Felsen, Esq.

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<sup>1</sup> See ECF Docket Entry [449](#).

Dated: Jamaica, New York  
July 1, 2025

**SAGE LEGAL LLC**

/s/ Emanuel Kataev, Esq.

cc: Safa Gelardi (via ECF)

Vito Gelardi (first class mail)  
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Cypress, TX 77433